

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

MY PILLOW, INC.,

Plaintiff,

vs.

US DOMINION, INC., DOMINION  
VOTING SYSTEMS, INC., and  
DOMINION VOTING SYSTEMS  
CORPORATION,

Defendants.

and

MICHAEL J. LINDELL,

Plaintiff,

vs.

US DOMINION, INC., DOMINION  
VOTING SYSTEMS, INC., DOMINION  
VOTING SYSTEMS CORPORATION,  
SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Defendants.

Case No. 21-cv-01015

Case No. 21-cv-01332

**STIPULATION TO TRANSFER CASES  
TO THE DISTRICT OF THE DISTRICT OF COLUMBIA**

WHEREAS, on February 22, 2021, U.S. Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, “Dominion”) filed suit against My Pillow, Inc. (“MyPillow”) and Michael J. Lindell (“Lindell”) in Cause No. 1:21-cv-0445-CJN in the United States District Court for the District of Columbia (the “Dominion Lawsuit” at Dkt. No. 1); and

WHEREAS, on April 19, 2021, MyPillow filed suit against Dominion in Cause No. 0:21-cv-01015-PJS-DTS in the United States District Court for the District of Minnesota

(the “MyPillow Lawsuit” at Dkt. No. 1); and

WHEREAS, on April 19, 2021, MyPillow filed a Motion to Dismiss the Dominion Lawsuit (Dominion Lawsuit at Dkt. No. 30); and

WHEREAS, on April 23, 2021, Lindell filed a Motion to Dismiss the Dominion Lawsuit (Dominion Lawsuit at Dkt. No. 34); and

WHEREAS, on June 3, 2021, Lindell filed suit against Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, “Smartmatic”) and Dominion in Cause No. 0:21-cv-01332-PJS-DTS in the United States District Court for the District of Minnesota (the “Lindell Lawsuit” at Dkt. No. 1); and

WHEREAS, on July 6 and 7, 2021, the Court stayed the MyPillow Lawsuit and the Lindell Lawsuit pending a ruling from the United States District Court for the District of Columbia on Motions to Dismiss the Dominion Lawsuit (MyPillow Lawsuit at Dkt. No. 49; Lindell Lawsuit at Dkt. No. 19); and

WHEREAS, on August 11, 2021, the United States District Court for the District of Columbia, Nichols, J., denied the Motions to Dismiss the Dominion Lawsuit filed by MyPillow and Lindell (Dominion Lawsuit at Dkt. Nos. 53-54; collectively, the “DC Dismissal Order”); and

WHEREAS, on August 20, 2021, the United States District Court for the District of Minnesota, Schiltz, J., held a status conference in the MyPillow Lawsuit and the Lindell Lawsuit and requested that the Parties confer about a stipulation to transfer the MyPillow Lawsuit and the Lindell Lawsuit to the United States District Court for the District of the District of Columbia; and

WHEREAS, the Parties have conferred in accordance with the Court’s request.

THEREFORE, the Parties, by and through their respective counsel, hereby stipulate and agree as follows:

1. The My Pillow Lawsuit and the Lindell Lawsuit shall be transferred to the United States District Court for the District of Columbia;
2. The Dominion Defendants and Smartmatic Defendants stipulate that the District for the District of Columbia is an appropriate venue for both the My Pillow Lawsuit and the Lindell Lawsuit;
3. Except for Paragraph 2 above, the Dominion Defendants and the Smartmatic Defendants do not waive—and expressly preserve—the right to challenge the above captioned actions on any grounds, including, but not limited to, under Rule 12(b)(6).
4. My Pillow and Lindell reserve the right to seek transfer of the My Pillow Lawsuit and the Lindell Lawsuit, respectively, back to the District of Minnesota in the event that an appeal of the DC Dismissal Order is taken and the Dominion Lawsuit is dismissed.

**SO STIPULATED.**

Dated: August 24,  
2021

By /s/ Andrew D. Parker

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